

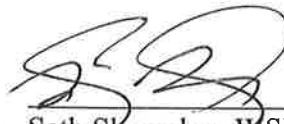
**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL DISTRICT WITHIN AND
FOR BIG HORN COUNTY, WYOMING**

ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,)	CV-2020-0000102 L
)	
Plaintiff,)	
)	
vs.)	
)	
KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Defendant.)	
)	
KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Counterclaimants,)	
)	
vs.)	
)	
ROCKY MOUNTAIN RECOVERY SYSTEMS INC.,)	
a Wyoming Corporation,)	
)	
Counterclaim Defendant.)	

**DEFENDANTS' CERTIFICATION OF SERVICE OF DEFENDANTS' REQUEST
FOR PRODUCTION OF DOCUMENTS AND FIRST SET OF
INTERROGATORIES DIRECTED TO PLAINTIFF/COUNTERCLAIM
DEFENDANT**

COME NOW the Defendants by and through their undersigned counsel who
certify that on the 21st day of April, 2021, Defendants emailed and sent via U.S. Mail,
first class postage prepaid, their First Set of Interrogatories Directed to
Plaintiff/Counterclaim Defendant and their Request for Production of Documents
Directed to Plaintiff/Counterclaim Defendant to Mr. Brett Allred, Attorney for
Plaintiffs/Counterclaim Defendants.

DATED this 21 day of April, 2021.



Seth Shumaker, WSB 6-3818

2 N. Main, Ste. 103

Sheridan, WY 82801

307/675-1233

307/675-1235 (fax)

sheridanwyolaw@gmail.com

Attorney or Defendants and Counterclaimants

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was this 21 day of April, 2021, forwarded to the persons listed below in the manner indicated:

Bret Allred
Wilkerson & Wilkerson, LLC
210 N. Bent St.
Powell, WY 82435
Attorney for Plaintiff

(☒) By U.S. Mail, Postage Prepaid
() By Facsimile Transmission
() By Overnight Courier
() By Hand Delivery
(☒) By Email



Seth Shumaker

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL DISTRICT WITHIN AND
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ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,)	CV-2020-0000102 L
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Plaintiff,)	
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vs.)	
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KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
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Defendant.)	
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MARTINEZ,)	
)	
Counterclaimants,)	
)	
vs.)	
)	
ROCKY MOUNTAIN RECOVERY SYSTEMS INC.,)	
a Wyoming Corporation,)	
)	
Counterclaim Defendant.)	

**DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED
TO PLAINTIFF/COUNTERCLAIM DEFENDANT**

COME NOW the Defendants and who, for their Request for Documents Directed to Plaintiff/Counterclaim Defendant, state:

These requests are of a continuing nature, requiring you to serve timely supplemental responses setting forth any information, within the scope of these requests, which may be acquired by you, your attorneys, investigators, agents, or others employed by or acting in your behalf, following the original responses. A request that a document or a copy of a document be attached to the responses to these requests is a request for production of that document at the address of counsel for Defendant on the date when

responses to these requests are due. Such request for production may be complied with by attaching a legible copy of such document to the answers to these responses in the manner requested.

REQUEST NO. 1: Please provide a true and accurate copy of any and all documents which you contend constitute an assignment between Plaintiff/Counterclaim Defendant and its assignor of Defendants' account(s) at issue in this matter.

RESPONSE:

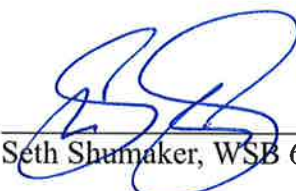
REQUEST NO 2: Please provide a true and accurate copy of any and all documents which evidence Plaintiff's agreement with its assignor of Defendants' account(s) at issue in this matter.

RESPONSE:

REQUEST NO. 3: Please provide a true and accurate copy of all documentation relied on by Plaintiff/Counterclaim Defendant in answering Defendants' First Set of Interrogatories Directed to Plaintiff/Counterclaim Defendant.

RESPONSE:

DATED this 21 day of April, 2021.



Seth Shumaker, WSB 6-3818

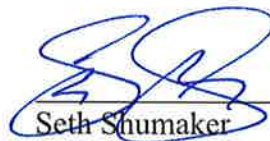
2 N. Main, Ste. 103
Sheridan, WY 82801
307/675-1233
307/675-1235 (fax)
sheridanwyolaw@gmail.com
Attorney or Defendants and Counterclaimants

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21 day of April, 2021, forwarded to the persons listed below in the manner indicated:

Bret Allred
Wilkerson & Wilkerson, LLC
210 N. Bent St.
Powell, WY 82435
Attorney for Plaintiff

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**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL DISTRICT WITHIN AND
FOR BIG HORN COUNTY, WYOMING**

ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,)	CV-2020-0000102 L
)	
Plaintiff,)	
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vs.)	
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KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Defendant.)	
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KAYTLYN WILSON MARTINEZ and MATTHEW)	
MARTINEZ,)	
)	
Counterclaimants,)	
)	
vs.)	
)	
ROCKY MOUNTAIN RECOVERY SYSTEMS INC.,)	
a Wyoming Corporation,)	
)	
Counterclaim Defendant.)	

**DEFENDANTS' FIRST SET OF INTERROGATORIES DIRECTED TO
PLAINTIFF/COUNTERCLAIM DEFENDANT**

COME NOW the Defendants and who, for their First Set of Interrogatories

Directed to Plaintiff/Counterclaim Defendant, state:

These interrogatories are of a continuing nature, requiring you to serve timely supplemental answers setting forth any information, within the scope of these interrogatories, which may be acquired by you, your attorneys, investigators, agents, or others employed by or acting in your behalf, following the original answers. A request that a document or a copy of a document be attached to the answers to these interrogatories is a request for production of that document at the address of counsel for

Defendant on the date when answers to these interrogatories are due. Such request for production may be complied with by attaching a legible copy of such document to the answers to these interrogatories in the manner requested.

INSTRUCTIONS

Type your answers to the following interrogatories in the space provided on this form or the Exhibits attached hereto where possible. If the space provided is not sufficient to completely answer each interrogatory, type your answer on a separate sheet of paper and attach same as an appendix hereto noting on this form which appendix contains your answer to said interrogatory and noting on the appendix reference to the interrogatory being answered.

INTERROGATORY NO. 1: Please state the name, address and position with Plaintiff if each person answering and assisting to answer these interrogatories:

ANSWER:

INTERROGATORY NO. 2: In regard to the account(s) for which the plaintiff has filed this action, please state:

- a. The value or consideration paid by Plaintiff to its assignor for Defendants' account(s);
- b. Whether there exists a document(s) which Plaintiff asserts memorializes that assignment; and
- c. Who possesses such documentation.

ANSWER

INTERROGATORY NO. 3: Does Plaintiff/Counterclaim Defendant provide legal services for persons and/or entities in the State of Wyoming?

ANSWER:

INTERROGATORY NO. 4: Is Plaintiff/Counterclaim Defendant a law office recognized as such by the Wyoming Bar?

ANSWER:

INTERROGATORY NO. 5: Does Plaintiff/Counterclaim Defendant receive a contingency fee for services it renders in this action for its assignor?

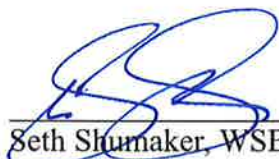
ANSWER:

INTERROGATORY NO. 6: If the answer to the previous interrogatory is in the affirmative, please state the terms of the contingency fee agreement between Plaintiff/Counterclaim Defendant and its assignor in this matter.

ANSWER:

INTERROGATORY NO. 7:

DATED this 24 day of April, 2021.


Seth Shumaker, WSB 6-3818

2 N. Main, Ste. 103
Sheridan, WY 82801
307/675-1233
307/675-1235 (fax)
sheridanwyolaw@gmail.com
Attorney or Defendants and Counterclaimants

CERTIFICATE OF SERVICE

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Wilkerson & Wilkerson, LLC
210 N. Bent St.
Powell, WY 82435
Attorney for Plaintiff

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